

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 26 1993

ORIGINAL
(Red)

Glen J. Salas
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

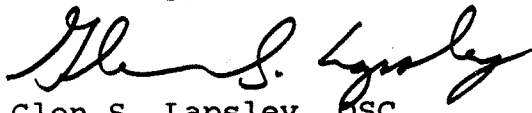
Re: Snow Hill Lane Site
Baltimore, MD

Dear Mr. Salas:

Your proposal to grade and stabilize excavated areas at the Site prior to receipt of analytical results of post-removal sampling, as described in your letter dated February 22, 1993, is hereby approved. As discussed in that letter and in my telephone conversations with John Haas of your office, should post-removal soil analysis reveal the presence of contaminants, all backfilled soil as well as contaminated soil, will be excavated and disposed of properly.

Should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,



Glen S. Lapsley, OSC
Removal Enforcement Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

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FEB 16 1993

Glen J. Salas
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

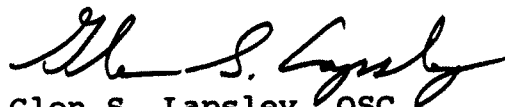
Re: Snow Hill Lane Site
Baltimore, MD

Dear Mr. Salas:

Your proposal for the post removal sampling of areas T-1 and T-4, as described in your Progress Report #13, is hereby approved. As discussed in our telephone conversation of February 16, 1993, areas T-2, T-3 and the area directly under the garbage bag, which will be removed, should also be sampled after removal operations and analyzed in the same manner as samples from areas T-1 and T-4.

As discussed, distinct composite soil samples from areas T-2 and T-3 will be taken and analyzed. One sample from under the garbage bag will be taken and analyzed in accordance with the approved method. Should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,



Glen S. Lapsley, OSC
Removal Enforcement Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

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FEB 04 1993

Glen J. Salas
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

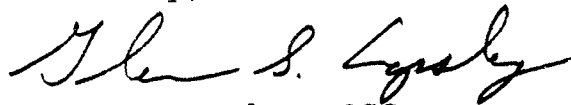
Re: Snow Hill Lane Site
Baltimore, MD

Dear Mr. Salas:

Your proposal for the removal and disposal of contaminated soil and drums containing contaminated materials is hereby approved. Therefore in accordance with paragraph 8.5 of Administrative Order Docket No. III-91-36-DC ("Order"), you are required to implement this Work with five (5) days of receipt of this letter.

Please, be sure to include copies of all disposal manifests in the Final Report required in paragraph 8.10 of the Order. Should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,



Glen S. Lapsley, OSC
Removal Enforcement Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

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CERTIFIED MAIL
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Glen J. Salas
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

JAN 29 1993

Re: Snow Hill Lane Site
Baltimore, MD

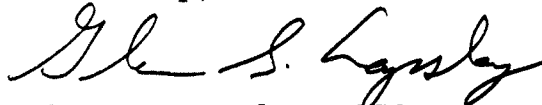
Dear Mr. Salas:

Thank you for Progress Report 11, which addresses the removal of contaminated soil from the Site. Your proposal for removal of the contaminated soil is adequate. However, EPA cannot authorize you to proceed with this operation without your naming the disposal facility to be used.

Additionally, your proposal does not address the disposal of drums present at the Site. This is also an essential element which must be clarified before removal operations may proceed.

In accordance with paragraph 8.4 of the Administrative Order, Respondents shall respond to and correct the above deficiencies and submit this information to EPA within five (5) business days of receipt of this letter. Should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,



Glen S. Lapsley, OSC
Removal Enforcement Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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841 Chestnut Building
Philadelphia, Pennsylvania 19107

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Patsy W. Glinsmann
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

MAY 20 1992

Re: Snow Hill Lane Site
Baltimore, MD

Dear Ms. Glinsmann:


Thank you for your response of May 18, 1992, to my comments on the Work Plan (WP) for the Snow Hill Lane Site. Upon review of your response, EPA believes that there are issues remaining which must still be addressed. In accordance with paragraph 8.5 of Administrative Order Docket No. III-91-36-DC (the Order), Respondents are obligated to address the following comments and submit their response to EPA within five (5) business days of the receipt of this letter. Items remain numbered to correspond with numbers given those comments in our previous correspondences. If a comment is not addressed in this letter, your response to that concern has been adequate.

8., 11., 12., & 14. In order for you to perform proper disposal of wastes at the Site, it is necessary for all Priority Pollutants to be analyzed for. To expedite this process, drum materials may be analyzed for Priority Pollutants not analyzed for previously. Using the results of the drum material analyses in conjunction with results of previous analyses, analyses of soil samples can then be performed for those materials identified at the Site. Based on these results the actual removal action can then be taken at the Site.

Concerning the West area, your proposal to analyze two core samples for the presence of contaminants before doing the full perimeter sampling is appropriate and hereby approved. EPA agrees that the core sample at the center of the ponded area should be analyzed. The second core sample should be taken adjacent to this area and down slope, as opposed to being at either end. If no contaminants are present in these samples, no further sampling will be necessary.

As always, should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,

A handwritten signature in black ink, appearing to read "Glen S. Lapsley". The signature is fluid and cursive, with the first name "Glen" being more prominent.

Glen S. Lapsley, OSC
Removal Enforcement Section

ORIGINAL
(Red)

cc: Edward F. May

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

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(Red)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 08 1992

Patsy W. Glinsmann
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

Re: Snow Hill Lane Site
Baltimore, MD

Dear Ms. Glinsmann:

Thank you for your response of April 3, 1992, to my comments on the Work Plan (WP) for the Snow Hill Lane Site. Upon review of your response, EPA believes that there are issues remaining which must still be addressed. In accordance with paragraph 8.5 of Administrative Order Docket No. III-91-36-DC (the Order), Respondents are obligated to address the following comments and submit their response to EPA within five (5) business days of the receipt of this letter. Items remain numbered to correspond with numbers given those comments in our previous correspondences. If a comment is not addressed in this letter, your response to that concern has been adequate.

8., 11., 12., & 14. Through discussion with EPA OSC, Dr. Walter Lee and with EPA's Technical Assistance Team (TAT), it has been determined that the only contaminants for which laboratory analyses were performed were Priority Pollutant Metals, PCB's, and cyanides. Therefore, your analyses must also include Priority Pollutants which have not been previously analyzed for in addition to those materials which were found to be present at the Site by EPA. Before compositing drum contents in each area, it should be determined in the field that these materials are compatible.

Where you state that materials will be analyzed for the Hazardous Substance List (HSL), as stated above, analysis must also include Priority Pollutants which have not been previously analyzed for in addition to those materials which were found to be present at the Site by EPA.

Background levels, as previously determined by EPA, must be stated and not merely referred to. Similarly, clean up criteria must also be fully specified.

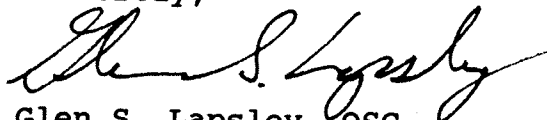
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In the West Area, perimeter soil sampling should be performed and analyzed in the manner which the drum areas are addressed in your Attachment 3, as opposed to the 4 inch core sampling proposed in that attachment, for either end of the pond.

24. A description of the set up of the decontamination area is necessary. It must be stated how wastes resulting from decontamination of equipment will be contained.

As always, should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glen S. Lapsley".

Glen S. Lapsley, OSC
Removal Enforcement Section

cc: Edward F. May

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

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ORIGINAL
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MAR 24 1992

Patsy W. Glinsmann
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

Re: Snow Hill Lane Site
Baltimore, MD

Dear Ms. Glinsmann:

Thank you for your response to my comments on the Work Plan (WP) for the Snow Hill Lane Site. Upon review of your response, EPA believes that there are issues remaining which must be addressed. In accordance with paragraph 8.5 of Administrative Order Docket No. III-91-36-DC (the Order), Respondents are obligated to address the following comments and submit their response to EPA within five (5) business days of the receipt of this letter. Items remain numbered to correspond with numbers given those comments in our previous correspondences. If a comment is not addressed in this letter, your response to that concern has been adequate.

8., 11., 12., & 14. In our telephone conversation of March 5, 1992, it was suggested that an initial round of soil sample analyses be performed for each distinct drum area. These would be composite samples which are representative of each area both horizontally and vertically. It is necessary to analyze these samples for priority pollutants and heavy metals in addition to any analyses which may be necessary to arrange for proper disposal. The results of these analyses, could then be used to determine what materials would be analyzed for in subsequent sampling events. You must indicate if it is your intention to perform this sampling.

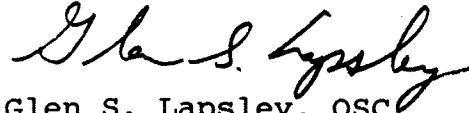
Also, the City or its representatives are welcome to review the Site files at EPA's Regional offices. Please contact me to arrange this.

16. It is still necessary to address the "pond" area concerning the extent of contamination in soil sediments below the water and whether drums are present beneath the ponded water.

24. Please submit a discussion of the method of decontamination of heavy equipment.

As always, should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,

A handwritten signature in cursive script, reading "Glen S. Lapsley".

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(Red)

Glen S. Lapsley, OSC
Removal Enforcement Section

cc: Edward F. May

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CERTIFIED MAIL
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Patsy W. Glinsmann
C. C. Johnson Malhotra
601 Wheaton Plaza South
Silver Spring, MD 20902

FEB 20 1992

Re: Snow Hill Lane Site
Baltimore, MD

Dear Ms. Glinsmann:

Thank you for your response to my comments on the Work Plan (WP) for the Snow Hill Lane Site. Upon review of your response, EPA feels that there are issues remaining which must be addressed. In accordance with paragraph 8.5 of Administrative Order Docket No. III-91-36-DC (the Order), Respondents are obligated to address the following comments and submit their response to EPA within five (5) business days of the receipt of this letter. To avoid confusion, items have been numbered to correspond with numbers given those comments in our previous correspondences. If a comment is not addressed in this letter, your response to that concern has been adequate.

1. Your proposed language defining the purpose of the Work Plan (WP) places limits on the removal action which were not intended by the Order. Therefore, the proposed language should not be incorporated into the revised WP.

2. This Order addresses only the portion of the Snow Hill Lane Site which is located on property owned by the City of Baltimore (the City) and the strip of land owned by DWC Trust Co. which is bordered on each side by the City's property. This does not limit the responsibility of the City under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). Therefore, the Site shall be referred to as the "Snow Hill Lane Site".

6. During the removal action EPA or its representative will accompany your personnel on an excursion to attempt to locate the drums thought to be located to the east of the known drum groups.

8. In order to determine the full extent of contamination at the Site, it is essential to know the total concentration of priority pollutants and metals present at the Site in addition to TCLP parameters, RCRA characteristics and PCB concentrations.

Since the imminent threat at the Site is posed through the pathway of exposure, total concentration is the main concern.

9. In order to determine where contamination is present, it is necessary to analyze soil samples and drum samples separately. Making assumptions of materials present at the Site precludes an objective evaluation of the extent of contamination. Considering the proposed changes to the sampling plan in the attached Table 1, it seems that compositing soil samples with drum samples is unnecessary.

10. Sampling results should be used to determine amount of material to be removed.

11., 12. & 14. As stated above, drum samples and soil samples should be analyzed separately. Soil samples surrounding the drum areas should be taken to allow for analysis of vertical extent of contamination at both the distance of 2-4 feet and 6 feet. Due to processing time for laboratory analytical services, all samples should be analyzed concurrently. Determining the limits of the contamination is significant to the extent of contamination study and to its application to the removal action. Actions to be taken in the event that the deepest soil samples show the presence of contamination should be stated in the sampling plan. It is necessary to sample until uncontaminated soil is reached.

Determining the effectiveness of removal by performing composite sampling of all excavated areas would be misleading. Post removal sampling as depicted in Table 4-2 of the original draft of the proposed WP, which depicts compositing soil samples in each distinct drum area, is more appropriate than the post removal sampling proposed in your response dated January 17, 1992. Also, actions to be taken in the event that these soil samples show the presence of contamination should be stated in the sampling plan. As stated in #8 above, analysis for total priority pollutants and total metals, in addition to TCLP parameters, RCRA characteristics and PCB concentrations, should be performed.

16. It must be stated how the submerged contents of the ponded area will be determined. A composite surface soil sample will not be sufficient to determine areal extent of contamination either during pre-removal sampling nor in post-removal sampling. Also it must be stated how vertical extent of contamination will be determined.

18. Is the security guard mentioned in your response currently providing security at the Pennington Avenue Landfill or is this an additional security guard? Also, is the fence mentioned, the fence which encompasses the Pennington Avenue Landfill? If these conditions are what is being proposed, they will not be adequate. During other removal actions taken by EPA at the Site, there was constant evidence of trespassing. It is necessary to limit

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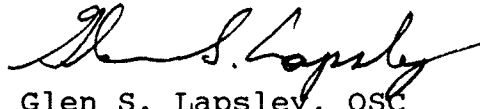
access to areas of concern as soon as possible. If this is accomplished with a fence, the fence should also be posted to indicate the presence of hazardous materials.

19. Subcontractors may submit their own Health and Safety Plan (HASP) which must be consistent with the Site HASP.

24. Decontamination of heavy equipment must still be discussed before EPA approval of the WP.

Your use of both the Gascoyne and RECRA Maryland laboratories, in accordance with the WP, is hereby approved. Should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,

A handwritten signature in dark ink, appearing to read "Glen S. Lapsley", written in a cursive style.

Glen S. Lapsley, OSC
Removal Enforcement Section

cc: Edward F. May

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

(Red)

CERTIFIED MAIL
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JAN 6 1991 *JK*
1992 8/5/92

Edward F. May
Chief
City of Baltimore
Bureau of Solid Waste
1000 Abel Wolman Municipal Building
Baltimore, Maryland 21202

Re: Snow Hill Lane Site
Baltimore, MD

Dear Mr. May:

Thank you for your Work Plan (WP) for the Snow Hill Lane Site. Upon review of the report, EPA feels that there are issues which still must be addressed. In accordance with paragraph 8.5 of Administrative Order Docket No. III-91-36-DC (the Order), Respondents are obligated to address the following comments and submit their response to EPA within five (5) business days of the receipt of this letter:

1. The intent of the WP, in accordance with Section 8.3 of the Order, should be to identify the extent of contamination in the soil, to identify, segregate and dispose of materials the Site, and to remove contamination found during the extent of contamination. The introduction does not accurately reflect this intent.

2. Also in the introduction, it is stated that the Site will be referred to as the Pennington Avenue Landfill Site. The Site name, in accordance with the Order, is the Snow Hill Lane Site. All correspondence referring to it shall refer to it as such. Any name other than the Snow Hill Lane Site will not be acceptable.

3. The Background Information Section states that several piles of 55 gallon drums were observed on the ground surface at several locations on a property owned by the estate of Jack Chertkof. This property is actually owned and controlled by the DWC Trust Co.

4. The Background Information Section also states that some of the drums were located on a right of way through Baltimore City (the City) property. This is not accurate. There is a strip of land, approximately 66 feet in width, which is owned and

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controlled by the DWC Trust Co. which is bordered by property owned by the City.

5. Figure 4-1 has probably been mislabelled, since the Current Site Conditions Section refers to Figure 3-1 and it is not present.

6. The pre-removal sampling plan fails to address an area of potential contamination to the east of the known drum group which must also be investigated. This area was brought to the attention of Steve Stinger of C.C. Johnson & Malhotra (CCJM), contractor for the City.

7. The pre-removal sampling plan calls for composite samples to be performed. Compositing samples lowers the detection limit requirement of the laboratory. For example:

$$\frac{\text{Maximum Allowable Concentration}}{\text{Number of Samples in Composite}} = \text{Detection Limit for Analysis}$$

No more than 10 samples should be composited.

8. While is it essential to analyze for TCLP parameters, it is also necessary to test for total concentration of each contaminant known to be present.

9. It is necessary to analyze different media, such as drum solids, drum liquids, and soils, separately as opposed to compositing all media.

10. It is stated that some areas that best professional judgement will be used to determine the amount of material to be removed in some areas. A more precise explanation is necessary to fully understand this determination and which will enable EPA to approve of the operation.

11. It is stated that, "Following removal of all drums and underlying plastic sheeting, a four inch deep layer of soil will be removed to provide for capture of contamination which may have leached from the drum contents". Prior to performing the extent of contamination survey, it is premature to assume that removal of four inches of soil will be sufficient to address the contamination in the soil.

12. Are soil samples to be taken at depths of 4 and 8 inches in addition to those suggested in table 4-1. If so, these samples should be taken at the time of the initial sampling, which would provide a more accurate representation of the extent of soil contamination.

13. The Plan for Identification of the Extent of Contamination is unclear how the extent of contamination will be determined horizontally or vertically. Compositing doesn't allow for a clear delineation of clean and contaminated soils.

14. A more extensive sampling plan is necessary initially to determine the area to be treated and after treatment to determine that the removal has been adequate.

15. It's not appropriate to composite samples from areas T1 (6 drums) and T2 (7 drums) as suggested in Table 4-2, since more than 10 sample aliquots will be in each composite sample.

16. In the ponded area, it is necessary to determine if contamination is present in media other than the pooled water, such as soil sediments below the water and whether drums are present beneath the water.

17. If the cylinder does not contain a hazardous material, it would not come under the authority of the Order. Therefore, it would not have to be removed in compliance with the Order, however, sample analysis of all substances should be made available for EPA review.

18. The Site Security Plan presented addresses protecting only the assets of contractors. It is necessary to consider Site Security from the perspective of protecting the public from exposure to the threat present at the Site.

19. All personnel entering the Site will be subject to the HASP included with the WP. Therefore, the reason for an additional HASP from the removal contractor, as stated in Section 6.0 is unclear.

20. Since the WP will not be approved in the time frame anticipated in the WP, the schedule will have to be amended. It would be prudent to generally reference operations in relation to the approval of the WP.

21. In the HASP, it is stated that the Site is adjacent to the Snow Hill Lane Site. As mentioned previously and in accordance with the Order, it is part of the Snow Hill Lane Site.

22. Since the implementation of the WP will occur during the winter, guidelines for treatment of Cold Stress should be included in the HASP.

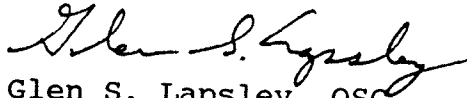
23. Concerning the symptoms/effects of acute exposure to contaminants present, abbreviations and technical jargon should be avoided. Personnel using the HASP may not be familiar with these terms.

24. Decontamination of heavy equipment should be discussed here. This is ultimately the responsibility of the City of Baltimore as the Respondent to the Order.

25. The telephone number for the Health Department and Poison Control Center should be filled in. Also the my name and telephone number, (215) 597-6684, should be included.

Should you have any questions, please feel free to contact me at (215) 597-6684.

Sincerely,



Glen S. Lapsley, OSC
Removal Enforcement Section

cc: Patsy Glinsmann